

PROSKAUER ROSE LLP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAILENDRA GHORPADE,

:

Plaintiff, : Civil Action No. 14-cv-4379 (JPO)

v. : ECF CASE

METLIFE, INC., METLIFE GROUP, INC., and
CHRISTOPHER TOWNSEND, in his individual
and official capacities,

:

Defendants.

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PLEASE TAKE NOTICE that Defendants MetLife, Inc., MetLife Group, Inc. and Christopher Townsend (collectively “Defendants”), by and through its undersigned attorneys, Proskauer Rose LLP, will move this Court, before the Honorable J. Paul Oetken, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date and time to be designated by the Court for: (i) an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Third, Fourth, Fifth, Sixth, Seventh and Eighth Causes of Action of the Amended Complaint with prejudice; or, in the alternative, (ii) an Order pursuant to Fed. R. Civ. P. 12(b)(2) dismissing the Amended Complaint with prejudice against defendant Christopher Townsend (the Fourth, Sixth and Eighth Causes of Action); and for such other relief as this Court may deem just and proper.

This Motion is based upon the accompanying Memorandum of Law, the Affidavit of Christopher Townsend, the Affirmation of Patrick J. Lamparello and the Exhibit attached thereto, and all other pleadings in this matter.

Dated: September 8, 2014
New York, New York

Respectfully submitted,

PROSKAUER ROSE LLP

By: /s/ Joseph Baumgarten

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